

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Andrey Slomnitsky

Plaintiff(s),

vs.

12 Scott A. Caldwell, Robert M. Buchan,
Randy E. Buffington, Stephen M. Jones

Defendant(s).

Case #3:14-cv-00175-LRH-WGC

VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL

FILING FEE IS \$250.00

Kian Tamaddoni, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Sullivan & Cromwell LLP

(firm name)

with offices at _____ 1870 Embarcadero Road
(street address)

Palo Alto

California

94303

(city) (state)
(650)461-5600, tamaddonik@sullcrom.com
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

Scott A. Caldwell, Robert M. Buchan * to provide legal representation in connection with [client(s)]

the above-entitled case now pending before this Court.

*Randy E. Buffington, and Stephen M. Jones

1 3. That since December 9, 2016 (date), Petitioner has been and presently is a
2 member in good standing of the bar of the highest Court of the State of California (state)
3 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
4 from the clerk of the supreme court or highest admitting court of each state, territory, or insular
5 possession of the United States in which the applicant has been admitted to practice law certifying
6 the applicant's membership therein is in good standing.

7 4. That Petitioner was admitted to practice before the following United States District
8 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
9 of other States on the dates indicated for each, and that Petitioner is presently a member in good
10 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
United States Court of Appeals, Ninth Circuit	May 10, 2019	312624
United States District Court, Northern District CA	April 19, 2019	312624
United States District Court, Eastern District CA	April 26, 2019	312624
United States District Court, Southern District CA	April 9, 2019	312624
United States District Court, Central District CA	April 22, 2019	312624

19 5. That there are or have been no disciplinary proceedings instituted against petitioner,
20 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
21 or administrative body, or any resignation or termination in order to avoid disciplinary or
22 disbarment proceedings, except as described in detail below:

23 N/A
24
25
26
27

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

3 N/A

6 7. That Petitioner is a member of good standing in the following Bar Associations.

7 California Bar Association
8 American Bar Association

10 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

12 Date of Application	13 Cause	14 Title of Court 15 Administrative Body 16 or Arbitrator	17 Was Application 18 Granted or 19 Denied
		NONE	

19 (If necessary, please attach a statement of additional applications)

20 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
22 extent as a member of the State Bar of Nevada.

23 10. Petitioner agrees to comply with the standards of professional conduct required of
24 the members of the bar of this court.

25 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
26 practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF California)
COUNTY OF Santa Clara)

Petitioner's signature

Kian Tamaddoni , Petitioner, being first duly sworn, deposes and says:

That the foregoing statements are true.

Petitioner's signature

Subscribed and sworn to before me this

25th day of September, 2019

Maria Isabel Cablera Ramirez (see attached seal)

Notary Public or Clerk of Court

**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate John Patrick Desmond,
(name of local counsel) Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

Dickinson Wright PLLC, 100 W Liberty Street, Suite 940 _____,
(street address)

Reno (city), Nevada (state), 89501 (zip code)

(775)343-7500, jdesmond@dickinsonwright.com
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation
2 constitutes agreement and authorization for the designated resident admitted counsel to sign
3 stipulations binding on all of us.

4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6

7 The undersigned party(ies) appoint(s) John P. Desmond as
8 his/her/their Designated Resident Nevada Counsel in this case.

9

10 By: SCOTT A. CALDWELL
(party's signature)

11

12 SCOTT A. CALDWELL, Defendant
(type or print party name, title)

13

14 (party's signature)

15 ROBERT M. BUCHAN, Defendant
(type or print party name, title)

16

17 (party's signature)

18 RANDY E. BUFFINGTON, Defendant
(type or print party name, title)

19

20 (party's signature)

21 STEPHEN M. JONES, Defendant
(type or print party name, title)

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8 his/her/their Designated Resident Nevada Counsel in this case.

9

10 By: _____

11 (party's signature)

12 SCOTT A. CALDWELL, Defendant

13 (type or print party name, title)

14 _____
(party's signature)

15 ROBERT M. BUCHAN, Defendant

16 (type or print party name, title)

17 _____
(party's signature)

18 RANDY E. BUFFINGTON, Defendant

19 (type or print party name, title)

20 _____
(party's signature)

21 STEPHEN M. JONES, Defendant

22 (type or print party name, title)

23 _____

24 _____

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8 his/her/their Designated Resident Nevada Counsel in this case.

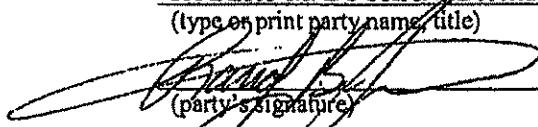
9

10 By: _____
11 (party's signature)

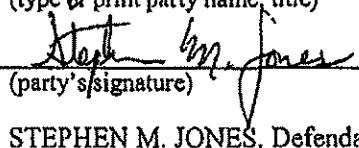
12 SCOTT A. CALDWELL, Defendant
13 (type or print party name, title)

14 _____
15 (party's signature)

16 ROBERT M. BUCHAN, Defendant
17 (type or print party name, title)

18 
19 _____
20 (party's signature)

21 RANDY E. BUFFINGTON, Defendant
22 (type or print party name, title)

23 
24 _____
25 (party's signature)

26 STEPHEN M. JONES, Defendant
27 (type or print party name, title)

1 CONSENT OF DESIGNEE

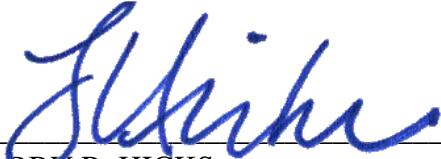
2 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

3 
4 Designated Resident Nevada Counsel's signature

5 5618 jdesmond@dickinsonwright.com
6 Bar number Email address

7 APPROVED:

8 DATED this 26th day of September, 2019.

9 
10 LARRY R. HICKS

11 UNITED STATES DISTRICT JUDGE



**The State Bar
of California**

180 Howard Street, San Francisco, CA 94105

**OFFICE OF ATTORNEY REGULATION
& CONSUMER RESOURCES**

888-800-3400

AttorneyRegulation@calbar.ca.gov

CERTIFICATE OF STANDING

September 18, 2019

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, KIAN TAMADDONI, #312624 was admitted to the practice of law in this state by the Supreme Court of California on December 9, 2016 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink that appears to read "Denise Velasco".

Denise Velasco
Custodian of Records

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**CIVIL CODE § 1189**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)

County of Santa Clara)On September 26, 2019 before me, Maria Isabel Caldera Ramirez

Date

Here Insert Name and Title of the Officer

personally appeared Kian Tamaddoni

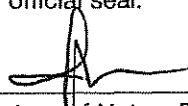
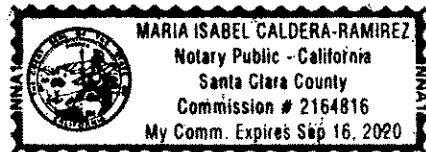
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature _____


Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached DocumentTitle or Type of Document: Pro Hac Vice Nevada Petition Document Date: 9/26/19Number of Pages: 16 Signer(s) Other Than Named Above: _____**Capacity(ies) Claimed by Signer(s)**Signer's Name: Kian Tamaddoni Corporate Officer — Title(s): _____ Partner — Limited General Individual Attorney in Fact Trustee Guardian or Conservator Other: _____

Signer Is Representing: _____

Signer's Name: _____

 Corporate Officer — Title(s): _____ Partner — Limited General Individual Attorney in Fact Trustee Guardian or Conservator Other: _____

Signer Is Representing: _____